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February 7, 2002

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

**Re: ET Docket No. 98-153 -- Revision of Part 15 of the Commission's Rules Regarding  
Ultra-Wideband Transmission Systems  
*Ex Parte Communication***

Dear Ms. Salas:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, on behalf of XtremeSpectrum, Inc., I am filing this letter electronically to report oral ex parte communications in the above-referenced proceeding.<sup>1</sup>

Today Martin Rofheart of XtremeSpectrum, Inc., Michele Farquhar, Esq., of Hogan & Hartson, L.L.P., Veronica Haggart, Esq., and I met with Edmond J. Thomas, Julius P. Knapp, Michael J. Marcus, Karen Rackley, and John A. Reed, and Ron Chase of the Office of Engineering and Technology.

We reiterated positions XtremeSpectrum has previously stated in this proceeding. In particular, we emphasized that XtremeSpectrum has shown conclusively that XtremeSpectrum's emissions mask fully protects all federal systems. XtremeSpectrum adopted NTIA's own methodology and criteria for this showing, as set out in NTIA Special Publication 01-43. In analyzing interference into certain radar systems from UWB devices located in or on buildings, XtremeSpectrum cited FAA and NOAA guidelines that limit above-ground structures within specified distances of those radars.<sup>2</sup>

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<sup>1</sup> XtremeSpectrum, with 67 employees, conducts research in ultra-wideband communications systems as its sole business. XtremeSpectrum intends to become a ultra-wideband communications manufacturer once the Commission authorizes certification of such systems. XtremeSpectrum takes no position on ultra-wideband radar applications.

<sup>2</sup> We filed a copy of our presentation to NTIA in this docket on February 4.

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In addition, XtremeSpectrum reasserted there is no technical support for limits in the 3.1-4.2 GHz band below Part 15 levels.

Martin Rofheart also responded to questions from Edmond Thomas about the details of chip manufacture and testing.

Attached is a handout we distributed at the meeting,.

If there are questions about this submission, please call me at the number above.

Respectfully submitted,

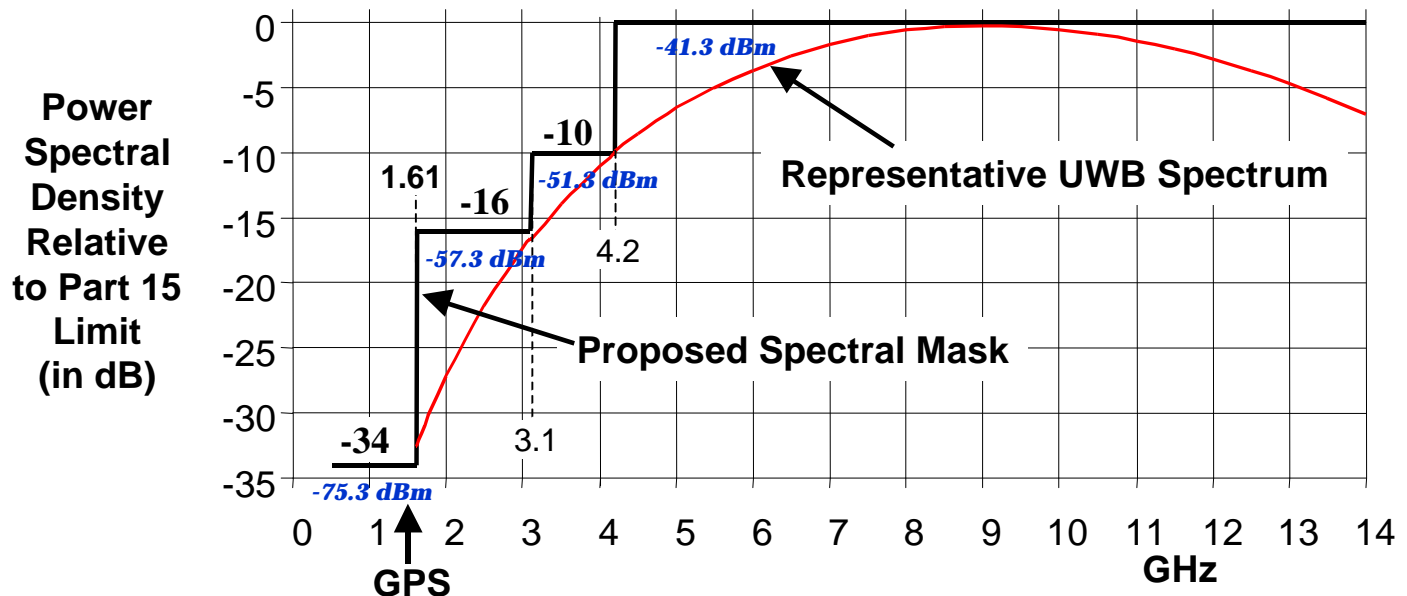
Mitchell Lazarus  
Counsel for XtremeSpectrum, Inc.

cc: Meeting participants

# XtremeSpectrum Summary



## ■ XtremeSpectrum proposed UWB levels



## ■ These levels are proven safe for all applications

- Peer-to-peer, indoor & outdoor, patios and balconies, 2 and 30 meter elevation
- No intentional emissions below 4.2 GHz (if needed)

## ■ Key elements of XtremeSpectrum proposed rules

- No mast or pole mounted UWB devices
  - Devices are indoors, on a patio or rooftop or on the ground
  - UWB will go where computers go—and must be safe!
- No automatic peer-to-peer
  - Must be deliberately initiated by the user

## ■ NTIA protection criteria satisfied

- Only NTIA criteria used
- All NTIA supplied data, measurements & methodologies accepted
- NTIA used Interference/Noise (I/N) criteria from ITU-R
  - Widely accepted ITU-R Recommendation
  - I/N criteria for radionav vetted in ITU-R SG 8 and accepted by FAA
- U.S. government radar system siting policies accepted